UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.¹

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly Administered)

AMENDED NOTICE OF REMOVAL OF CERTAIN CLAIMS FROM ADMINISTRATIVE CLAIMS RECONCILIATION AND ALTERNATIVE DISPUTE RESOLUTION

To the Honorable United States District Judge Laura Taylor Swain:

1. On March 12, 2020, the Court entered the *Order (A) Authorizing Administrative Reconciliation Of Claims, (B) Approving Additional Form Of Notice, and (C) Granting Related Relief* [ECF No. 12274] (the "ACR Order"), authorizing the Commonwealth of Puerto Rico (the "Commonwealth"), the Puerto Rico Highways and Transportation Authority ("HTA"), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS"), the Puerto Rico Electric Power Authority ("PREPA"), and the Puerto Rico Public Buildings Authority

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567- LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

("<u>PBA</u>," and together with the Commonwealth, HTA, ERS, and PREPA, the "<u>Debtors</u>") to resolve certain Pension/Retiree Claims, Tax Refund Claims, Public Employee Claims, and Grievance Claims (each as defined in the ACR Order) utilizing the Debtors' existing administrative reconciliation processes ("<u>Administrative Claims Reconciliation</u>").

- 2. Pursuant to the ACR Order, the Debtors have filed twenty-three notices transferring claims into Administrative Claims Reconciliation (as defined in the ACR Order), (collectively, the "ACR Transfer Notices"), and have transferred approximately 44,704 claims (collectively, the "ACR Designated Claims"), into Administrative Claims Reconciliation.
- 3. On April 1, 2020, this Court entered the *Order (A) Authorizing Alternative Dispute Resolution Procedures, (B) Approving Additional Form of Notice, and (C) Granting Related Relief* [ECF No. 12576] (the "ADR Order"). The ADR Order authorized the Commonwealth of Puerto Rico (the "Commonwealth"), the Puerto Rico Highways and Transportation Authority ("HTA"), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS"), the Puerto Rico Electric Power Authority ("PREPA"), and the Puerto Rico Public Buildings Authority ("PBA," and together with the Commonwealth, HTA, ERS, and PREPA, the "Debtors") to resolve general unsecured claims using the procedures approved by the court in the ADR Order ("ADR Procedures").
- 4. Pursuant to the ADR Order, the Debtors have filed twenty-three notices transferring claims into the ADR Procedures (as defined in the ADR Order), (collectively, the "<u>ADR Notices</u>"), and have transferred approximately 960 claims (collectively, the "<u>ADR Designated Claims</u>") into the ADR Procedures.
- 5. In light of information received from the claimants following the transfer of claims, the Debtors determined that certain ACR Designated Claims and ADR Designated Claims were most efficiently resolved via omnibus objections. On May 13, 2022, the Debtors filed *Notice of Removal*

of Claims from Administrative Claims Reconciliation and Alternative Dispute Resolution [ECF No. 20778] (the "Notice of Removal"), removing from the ACR Procedures the claims identified on **Exhibit A** thereto, and removing from the ADR Procedures the claim identified on **Exhibit B** thereto.

6. Exhibit B to the Notice of Removal inadvertently included two claims, Proof of Claims Nos. 11497 and 11790. Accordingly, the Debtors hereby submit an amended Notice of Removal with a corrected Exhibit B in clean and redline.

Dated: June 24, 2022 San Juan, Puerto Rico Respectfully submitted,

/s/ Hermann D. Bauer Hermann D. Bauer USDC No. 215205 Carla García Benítez USDC No. 203708

O'NEILL & BORGES LLC

250 Muñoz Rivera Ave., Suite 800 San Juan, PR 00918-1813

Tel: (787) 764-8181 Fax: (787) 753-8944

Attorneys for the Financial Oversight and Management Board for Puerto Rico, as representative for the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, Employees Retirement System of the Government of the Commonwealth of Puerto Rico, Puerto Rico Electric Power Authority, and Puerto Rico Public Buildings Authority

/s/ Brian S. Rosen

Martin J. Bienenstock (pro hac vice) Brian S. Rosen (pro hac vice)

PROSKAUER ROSE LLP

Eleven Times Square New York, NY 10036 Tel: (212) 969-3000 Fax: (212) 969-2900

Co-Attorneys for the Financial Oversight and Management Board for the Puerto Rico, as representative for the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, Employees Retirement System of the Government of the Commonwealth of Puerto Rico, Puerto Rico Electric Power Authority, and Puerto Rico Public Buildings Authority

Case:17-03283-LTS Doc#:21344 Filed:06/24/22 Entered:06/24/22 14:47:26 Desc: Main Docume $\mathbf{E}_{\mathbf{k}}$ by $\mathbf{E}_{\mathbf{G}}$ $\mathbf{E}_{\mathbf{G}}$ $\mathbf{E}_{\mathbf{G}}$ $\mathbf{E}_{\mathbf{G}}$

Claim	Claimant	Debtor	Total Filed
121790	ALICEA CRUZ, ADA E	Commonwealth of Puerto Rico	\$ -
95339	CAMPOS, LYDIA	Commonwealth of Puerto Rico	s -
49494	COLLAZO OCASIO, ERANIO DE J.	Commonwealth of Puerto Rico	\$ -
78824	COLON LOZADA, EMILY	Commonwealth of Puerto Rico	\$ -
16070	ESCUDERO ORTIZ, JUDITH	Commonwealth of Puerto Rico	\$ -
32686	MELENDEZ RIVERA, IVETTE	Commonwealth of Puerto Rico	\$ -
77585	MOLINA RUIZ, LILIA	Commonwealth of Puerto Rico	\$ -
79691	PEREZ SANTIAGO , MARTHA E	Commonwealth of Puerto Rico	\$ -
23633	RAMIREZ LOZANO, EVELYN	Commonwealth of Puerto Rico	\$ -
33322	REYES ORTIZ, SONIA	Commonwealth of Puerto Rico	\$ -
75940	RIVERA ORTIZ, MICAEL	Commonwealth of Puerto Rico	\$ -
151076	MONTALVO ROQUE, ALICIA	Commonwealth of Puerto Rico	\$ -

Case:17-03283-LTS Doc#:21344 Filed:06/24/22 Entered:06/24/22 14:47:26 Desc: Main Do**Enhibit** \mathbf{B} - **Fagrested (Redline)**

Claim	Claimant	Debtor	Total Filed
121790	ALICEA CRUZ, ADA E	Commonwealth of Puerto Rico	\$ -
95339	CAMPOS, LYDIA	Commonwealth of Puerto Rico	\$ -
49494	COLLAZO OCASIO, ERANIO DE J.	Commonwealth of Puerto Rico	\$ -
78824	COLON LOZADA, EMILY	Commonwealth of Puerto Rico	\$ -
16070	ESCUDERO ORTIZ, JUDITH	Commonwealth of Puerto Rico	\$ -
32686	MELENDEZ RIVERA, IVETTE	Commonwealth of Puerto Rico	\$ -
77585	MOLINA RUIZ, LILIA	Commonwealth of Puerto Rico	\$ -
79691	PEREZ SANTIAGO , MARTHA E	Commonwealth of Puerto Rico	\$ -
23633	RAMIREZ LOZANO, EVELYN	Commonwealth of Puerto Rico	\$ -
33322	REYES ORTIZ, SONIA	Commonwealth of Puerto Rico	\$ -
75940	RIVERA ORTIZ, MICAEL	Commonwealth of Puerto Rico	\$ -
151076	MONTALVO ROQUE, ALICIA	Commonwealth of Puerto Rico	\$ -
11497	Members of Succesion Yesmin Galib	Puerto Rico Electric Power Authority	\$53,706.38
11790	Valdivieso, Jorge Lucas P.	Puerto Rico Electric Power Authority	\$ 53,706.38